

Television booster stations have been in use for many years to allow analog television stations to provide “fill in” service in areas that cannot receive an adequate signal from the station’s main transmitter, usually because of terrain blockage. It cannot be denied that television booster stations have served their purpose quite well.

Digital television stations generally are assumed to replicate, to a large extent, the service area of the companion analog station. However, in many cases, particularly where the digital station has maximized its facilities or has proposed maximum facilities, or where there is no companion channel, i.e., recently authorized stations, the service area may be different from the analog station's service area. Thus, it stands to reason that there will be many cases in which the digital television station will have areas that cannot receive the signal from the main transmitter, and will have a need for "fill in" service.

*In Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations*, 19 FCC Rcd 19331 (2004), the Commission stated that it would not establish a digital booster station class, in part, because of the likelihood of this proceeding, initiated some 15 months later, to authorize DTS. On the other hand, the Commission noted that it would permit on-channel translator stations that are technically equivalent to boosters, but applications for which could only be filed during specified windows and would presumably be subject to competitive bidding.

Many commenting parties have extolled the virtues of DTS, pointing out that such systems would eliminate the need to construct a tall tower and to utilize a powerful transmitter; instead numerous shorter towers or other

antenna sites and lower power transmitters would be used to provide the service. Yet, in this proceeding, the Commission rejected the concept that DTS could be used to provide service throughout a station's DMA, and proposed that the area to be served by the DTS would be equivalent to the service area of a full power digital television station.

The NPRM specifically sought comment on the impact of the DTS proposals on the need for digital booster stations, and whether DTS would reduce (or eliminate) the need for digital booster stations.

The overwhelming majority of digital television stations will be able to provide adequate service within their protected contours without the need for any "fill in" supplements. For those stations which do require supplemental service, generally one or two boosters will be sufficient.

Although DTS antennas could be mounted, in many cases, on existing towers or building tops without any significant construction costs, the licensee is faced with negotiating with numerous, perhaps scores of landlords, whether tower owners, building managers or landowners. Antenna space rental payments could easily match or exceed the cost of constructing the facilities for a main transmitter and one or two booster stations.

Additionally, in some areas it may be necessary to contract with more than one or two electric power companies. While a booster receives the primary station's signal and rebroadcasts it, DTS will require synchronization of numerous transmitters.

In short, while DTS may be attractive to many, it is not without a downside to licensees.

Whether or not the Commission decides to authorize Distributed Transmission System Technology, WOGF urges the Commission to authorize digital booster stations to serve the same purpose as analog booster stations. If DTS is authorized, digital television licensees will be able to choose the system (DTS or booster) that best fits their needs.

Additionally, WOGF notes that a number of its affiliates' stations, as well as many other stations, do not have a paired digital channel. Thus, these stations will "flash cut" to digital at an appropriate time, and not necessarily at the end of the digital transition period. Stations with a companion digital channel, absent waiver, must build out their digital facilities by July 1, 2006 or risk the loss of protected coverage area. Once the digital facility is built out, there is little reason to continue to operate two full power facilities. Unless the Commission authorizes digital booster stations promptly, many stations will be faced with a potential loss of service area or the need to build a DTS under the interim rules.

Respectfully submitted,

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